

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

GINA PRIANO-KEYSER, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

APPLE, INC.,

Defendant.

Case No. 2:19-cv-09162

**STIPULATION AND PROPOSED ORDER MODIFYING
TIME TO RESPOND TO COMPLAINT**

WHEREAS, on April 1, 2019, Plaintiff Gina Priano-Keyser (“Priano-Keyser” or “Plaintiff”) filed a complaint (“Complaint”) against Apple, Inc. (“Defendant” or “Apple”) in the United States District Court for the District of New Jersey, alleging violations of the New Jersey Consumer Fraud Act, breach of express warranty, and breach of the implied warranty of merchantability (the “Action”).

WHEREAS, Apple was served with the Complaint on April 10, 2019.

WHEREAS, Apple has not received any prior extensions of time to respond to the Complaint.

WHEREAS, this Stipulation is made prior to the expiration of the period for any defendant in the above-captioned action to answer, move, or otherwise respond to the Complaint.

IT IS HEREBY STIPULATED AND AGREED, subject to approval by the Court, by and between the parties, by and through their undersigned counsel, that:

1. Upon entry of this Order, counsel for Apple stipulates that service of process was proper under Rule 4 of the Federal Rules of Civil Procedure.

2. Except as to service of process, and notwithstanding entry into this Stipulation, Apple expressly preserves any and all defenses or objections, and Apple expressly reserves the right to challenge the Complaint on any and all grounds.

3. Apple shall move, answer, or otherwise respond to the Complaint by May 17, 2019.

IT IS SO ORDERED.

DATE: 4/29/19



U.S.D.J.

Dated: April 26, 2019

Respectfully submitted,

WEIL, GOTSHAL & MANGES LLP

SHEPHERD, FINKELMAN, MILLER &
SHAH, LLP

By: /s/ Allison M. Brown
ALLISON M. BROWN

/s/ James C. Shah
JAMES C. SHAH

ALLISON M. BROWN (Bar No. 44992012)
allison.brown@weil.com
RICHARD HEASLIP (Bar No. 140052015)
richard.heaslip@weil.com
WEIL, GOTSHAL & MANGES LLP
17 Hulfish Street, Suite 201
Princeton, NJ 08542
Telephone: (609) 986-1100
Facsimile: (609) 986-1199

James C. Shah
Natalie Finkelman Bennett
475 White Horse Pike Collingswood, NJ
08107 Tel: 856-858-1770
Fax: 866-300-7367
jshah@sfmslaw.com
nfinkelman@sfmslaw.com

DAVID R. SINGH (*pro hac vice* pending)
david.singh@weil.com
HONG-AN N. TRAN (*pro hac vice* pending)
an.tran@weil.com
WEIL, GOTSHAL & MANAGES LLP
201 Redwood Shores Parkway, 6th Floor
Redwood Shores, CA 94065
Telephone: (650) 802-3000
Facsimile: (650) 802-3100

John F. Edgar
Brendan M. McNeal
EDGAR LAW FIRM LLC
1032 Pennsylvania Ave.
Kansas City, MO 64105
Tel: 816-531-0033
jfe@edgarlawfirm.com
bmm@edgarlawfirm.com

Attorneys for Plaintiffs

Attorneys for Defendant Apple Inc.